

DISHA RESOURCES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the “Board”) of Disha Resources Limited (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. Purpose of the Policy

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. Administration

Attached as **Annexure A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

4. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Annexure A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be

kept by Employees who are disposing of the Documents in the format prescribed at **Annexure B**.

5. Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

6. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

ANNEXURE A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Personnel Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Common Seal	Permanent
2	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3	Statutory Registers	Permanent
4	License and Permissions	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Register of Members	Permanent
7	Index of Members	Permanent
Miscellaneous		
8	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
9	Board Agenda and supporting documents	8 years
10	Attendance Register	8 years
11	Office copies of Notice of General Meeting and related papers	8 years
12	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 years
Miscellaneous		
13	Register of Debenture-holders, if any	15 years after the redemption of debentures
14	Index of debenture-holders, if any	15 years after the redemption of Debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 years		
2	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
3	Bank Statements	8 years
4	Investment Records	8 years
Miscellaneous		
5	General Correspondence	3 years

C: Tax Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Tax Bills, receipts and payments	Permanent

Documents to be retained for a minimum period of 8 years		
3	Tax Deducted at Source Records	8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later
4	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
5	Service Tax papers	8 years from the end of Financial Year or completion of assessment under Service Tax whichever is later

D: Legal Files and Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
Miscellaneous		
3	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter
4	Litigation files	3 year after close of the Litigations

E: Property Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent
3	Property Insurance	Permanent

F: Project		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Project Documents and Related correspondence (including any proposal of the Project and its approval)	Permanent

G: Personnel Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Payroll Registers	Permanent

2	Bonus, Gratuity and other Statutory Records	Permanent
Documents to be retained for a minimum period of 8 years		
3	Time office Records and Leave Cards	8 years
4	Unclaimed Wages Records	8 years
5	Employees Information Records	8 years after separation
Miscellaneous		
6	Employees Medical Record	3 years after separation

ANNXURE-B

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Secretary or other authorised person